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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Petition to Amend Part 68 of the)
Commission's Rules to Include)
Terminal Equipment Connected to)
Basic Rate Access Service Provided)
via Integrated Services Digital)
Network Access Technology)

and)

In the Matter of)

Petition to Amend Part 68 of the)
Commission's Rules to Include)
Terminal Equipment Connected to)
Public Switched Digital Service)

and)

Correction of Part 68 Typographical)
Errors, Clarifications and a Proposal)
for Part 68 Registration Revocation)
Procedures)

CC Docket No. 93-268)

RM 7815)

RM 6147)

**COMMENTS OF SOUTHWESTERN BELL
TELEPHONE COMPANY**

Southwestern Bell Telephone Company ("SWBT"), by its attorneys, submits these comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") released November 22, 1993.¹ In its NPRM, the Commission proposes to amend its Part 68 rules² to include terminal equipment designed for connection to the Integrated Switched Digital Network ("ISDN"). With limited exceptions, these proposals are in the public interest and should

¹ FCC 93-484.

² 47 C.F.R. Section 68.1, et seq.

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be adopted. Further, SWBT supports the Commission's adoption of the registration revocations procedures set forth in the NPRM.

I. BACKGROUND

SWBT's petition for rulemaking was one of two petitions which precipitated the NPRM in this docket.³ SWBT's petition requested the Commission to amend Part 68 to include terminal equipment connected to the two-wire Basic Rate Access ("BRA") interface provided by ISDN access technology. Comments submitted by AT&T in response have led the Commission to expand the proposed amendments to include terminal equipment connected to the four-wire ISDN Primary Rate Access ("PRA") interface.⁴

II. PART 68 CHANGES FOR TERMINAL EQUIPMENT CONNECTED TO THE TWO-WIRE BRA INTERFACE PROVIDED BY ISDN

SWBT's petition, generally supported by commentators, was based on the American National Standards Institute ("ANSI") standard for BRA ISDN (ANSI T1.601, 1988, Integrated Services Digital Network Basic Access Interface for Use on Metallic Loops for Application on the Network Side of NT-Layer 1 Specification).⁵ The Commission's proposed rule changes to accommodate equipment

³ SWBT's Petition For Rulemaking, RM 7815, filed August 23, 1991. The other petition for rulemaking was filed by Ameritech, in RM 6147, seeking Part 68 amendments allowing connection of terminal equipment to Public Switched Digital Service.

⁴ NPRM, para. 3.

⁵ SWBT Petition for Rulemaking at 3, n. 5; SWBT's Reply to Comments Regarding Petition for Rulemaking, filed November 21, 1991 at 1, n. 1.

connected to the two-wire ISDN BRA interface largely incorporate the proposals SWBT made in its petition.

These proposed rule changes would affect: Rule 68.2 (a)(10), regarding enlarging the scope of Part 68 to include applicability to ISDN BRA; Rule 68.2(k)(1) and (2), regarding grandfathering of equipment connected to ISDN BRA; Rule 68.3, regarding the definition of ISDN Basic Rate interface; Rule 68.308(h)(4) regarding limitations on terminal equipment connected to ISDN BRA; and Rule 68.314(f), regarding on-hook signal requirements for registered terminal equipment connected to ISDN BRA.⁶ SWBT is unaware of any developments that have emerged since SWBT filed its petition that question the benefits these proposals would afford, and the NPRM cites none. Thus, each should be adopted, in the form set forth in the Appendix to the NPRM.

The NPRM further proposes that the new rules reflect a metallic-to-longitudinal requirement.⁷ If this proposal were implemented, the last sentence of Rule 68.310(1)(1) would be revised to include a reference to the metallic termination used for the longitudinal balance measurements for ISDN BRA. SWBT agrees that such a requirement squarely addresses the network harm of crosstalk, is within Part 68's purview, and should be adopted in the form proposed by the NPRM.

The NPRM correctly observes that ISDN terminal equipment has the same potential for signaling interference as other digital

⁶ NPRM, Appendix A.

⁷ NPRM, para. 4.

equipment connected to the analog network.⁸ Thus, SWBT agrees that the signaling interface requirements in Rule 68.314(d)(2) should also apply to such equipment.

Finally, SWBT continues to support the ANSI standard for BRA that proposes an eight-position non-keyed jack. This arrangement would be consistent with that used with other subrate digital data services currently utilizing the RJ48S jack (also an eight conductor, non-keyed jack).

SWBT disagrees with the view that an RJ11C jack could accommodate six wires and should be used for ISDN BRA services.⁹ Although there are six positions (or "pins") within an RJ11C jack, the 625-type connecting block used with the jack can only accommodate termination of four wires. Such a jack would not be capable of providing present or future battery, power, or optional features that may be identified by ANSI.

Nor is it sufficient to compel vendors, who presumably could "build-to" the eight position interface, to provide connection to the RJ11C jack by utilizing a six-position to eight-position double-male adapter. Such a configuration would place an unnecessary item of equipment in the circuitry, which itself could present a source of potential service disruption or other trouble.

Accordingly, SWBT continues to support the Part 68 rule changes it proposed to accommodate ISDN BRA services and the additionally noted proposals, as modified above.

⁸ NPRM, para. 5.

⁹ NPRM, para. 6.

III. PART 68 CHANGES FOR TERMINAL EQUIPMENT CONNECTED TO THE FOUR-WIRE PRA INTERFACE PROVIDED BY ISDN

As noted in the NPRM, ANSI has also approved performance and compatibility standards for terminal equipment connected to the four-wire ISDN PRA (1.544 Mbps) interface.¹⁰ SWBT agrees that the same considerations of encouraging development of ISDN terminal equipment, industry uniformity, and worldwide compatibility of equipment connected to the BRA interface apply equally to the PRA interface. Thus, the Commission's proposed Part 68 amendments to accommodate ISDN PRA services are appropriate and should be adopted.

SWBT suggests that interface jacks and other devices generally applicable to ISDN PRA services should comply with existing FCC interface rules applicable to 1.544 Mbps services. As a result, the RJ48C jack, already sanctioned by the Commission for use with 1.544 Mbps services,¹¹ should also be utilized as the interface jack for ISDN PRA.

IV. PART 68 REGISTRATION REVOCATION PROCEDURES

The Commission's Part 68 rules currently do not include procedures for revoking equipment registration, i.e., authorization for a specific type of terminal equipment to be directly connected to the switched telephone network. SWBT fully agrees with the Commission's observation that the public interest is not served in instances where, for example, authorization of a piece of equipment

¹⁰ NPRM, para. 3.

¹¹ FCC Public Notice, No. 2526, February 10, 1986 (appended hereto as "Attachment 1").

had been obtained by fraud or continued use of the equipment might be harmful to the telephone network.¹² Thus, SWBT supports the Commission's proposal to subject such a non-compliant Part 68 registrant to possible revocation of its equipment's registration.¹³

The Commission's proposed use of a "Notice of Intent to Revoke Equipment Registration," in the manner outlined by the NPRM,¹⁴ is also appropriate. This procedural vehicle would allow the Commission to initiate swift and decisive action against an allegedly non-compliant registrant, while also allowing the registrant a full and fair opportunity to be heard on the merits of the allegation.

¹² NPRM, para. 9.

¹³ NPRM, para. 10.

¹⁴ NPRM, para. 11.

V. CONCLUSION

The Commission should amend its Part 68 rules to include terminal equipment designed for connection to ISDN BRA and PRA interfaces in the manner stated above, and should also adopt the rules it has proposed governing registration revocation procedures.

Respectfully submitted,

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February 10, 1986

NEW PART 68 PLUGS AND JACKS ADOPTED

To permit the connection of terminal equipment to newly authorized digital services (1st Second Report and Order, CC Docket No. 81-216, 50 Fed. Reg. 48203, Nov. 23, 1985), and to local area data channels (2nd Third Report and Order, CC Docket No. 81-216, 51 Fed. Reg. 979, Jan. 9, 1986), we are adopting appropriate plug and jack connectors as authorized by Section 68.104(c) of the rules (47 C.F.R. 68.104(c)). This rule section authorizes adoption of new plugs and jacks through a tariff description procedure as an alternative to description in Subpart F of Part 68. Agreement has been reached through the T.I.C.I. Committee of the Exchange Carriers Standards Association for the inclusion of these plugs and jacks in appropriate tariffs. The new connectors are identified as follows:

<u>Services</u>	<u>USOC Connectors</u>
LADC & Subrate	RJ48S, RJ48T
1.544 Mbps	RJ48C, RJ48M, RJ48X

Descriptions of these connectors are attached.

Attachment

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CERTIFICATE OF SERVICE

I, Linda Prater, hereby certify that the foregoing
"Comments of Southwestern Bell Telephone Company", has been
served this 10th day of February, 1994, to the Parties of Record.



Linda Prater

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